

E-2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 500
DENVER, CO 80202-2466

IAN - 8 1999

Ref: 8EPR-EP

Malcolm R. Edwards, District Ranger
Medicine Bow-Routt National Forest
Douglas Ranger District
2250 East Richards Street
Douglas, Wyoming 82633

Re: Cold Spring Ecosystem Management Project,
Draft Environmental Impact Statement

Dear Mr. Edwards:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS). We submit the following concerns and comments for your consideration in preparation of the Final EIS.

We understand that analysis of the proposed action and subsequent alternatives is to meet the desired condition for forest health in the Cold Springs Analysis Area (CSAA). Presently, 70 percent of the forested areas are mature or overmature. This age/condition class is at risk from outbreaks of mountain pine beetle, dwarf mistletoe, and Comandra blister rust.

The proposed action treatments include sanitation/salvage harvest of declining and dead mountain pine beetle infested and dwarf mistletoe and Comandra blister rust infected pine, and other high-risk pine, fir or spruce trees that meet minimum merchantability standards for sale. Harvest methods include overstory removal and commercial thinning on an estimated 2,049 acres. In addition, stand regeneration methods, which will include shelterwood preparation, the seedtree method and clearcuts, will occur on an estimated 731 acres to meet management goals. An estimated total of 12.9 MMBF (million board feet) of timber will be harvested.

Along with the No Action Alternative five additional action alternatives were analyzed. Alternative 6, was selected as the preferred alternative. This alternative would apply the treatments and harvest methods discussed under the proposed action using traditional logging methods but would apply cut-to-length harvesters and forwarder equipment in those harvest units proposed for roadless areas. An estimated 13.5 MMBF of timber would be harvested from 2,317



Printed on Recycled Paper

acres. This alternative proposed approximately 19.9 miles of road construction, 11.1 miles of low standard road construction, and up to 6.4 miles of temporary road construction.

The Forest is to be complimented on its cooperative actions, dating back to 1981, with the Wyoming Division of Forestry, the Wyoming State Extension Service and local land owners in the development and implementation of pest prevention forestry practices and reducing Mountain Pine beetle (MPB) risk in the CSAA. We understand that implementation of the preferred alternative will result in further pest prevention and risk reduction.

EPA concerns related to this type of project are primarily related to water quality concerns. We note from the Soils Environmental Consequences discussion in Chapter 4, page 4-1 through 4-3, and information provided in Table 4-1. Soil Characteristics for Each Alternative, that much of the acreage to be disturbed by timber harvest is characterized by soils that will result in moderate to severe sheet/rill erosion. It is also noted that..."Sediment transport, surface erosion, and mass wasting are all associated with road surface, fill material and cut bank." This section should be expanded to discuss where and which soils type will be impacted by proposed road construction and the potential environmental impact. It would be helpful to at least summarize those Forest Plan standards and guidelines and Wyoming Best Management Practices for Silviculture applicable to proposed timber harvest activities and all new road construction, reconstruction and road maintenance in the FEIS.

It is unclear what degree of timber harvest activity or road construction/reconstruction is proposed for MA 9A: Water, emphasis on riparian management. Statements on page 4-2, "The mitigation measures incorporated into the streamside management zones restrict operations along watercourses to maintain bank stability and vegetation. These measures will reduce erosion that may result from disturbance in and adjacent to water courses.", assure minimization of erosion impacts but need to be discussed in more detail. We presume that streamside management zones refer to those riparian areas within 100 feet on both sides of perennial streams, as mentioned on page 1-12.

Discussion on page 1-3, reveals that headwaters of four adjacent watersheds, Box Elder and East Box Elder Creeks, La Prele Creek and Rock Creek, are located in the CSAA. These watersheds are all tributary to the North Platte River. Impact analysis related to 4.5 Watershed and 4.6 Fish and Wildlife, pages 4-14 through 4-25 discuss water quantity, water quality and aquatic impacts related to timber harvest and road related activity. It is acknowledged that in those watersheds where silvicultural practices and road building are concentrated, specifically East Box Elder Creek and La Prele Creek, that sediments produced would have some measurable impact downstream. While it does not appear that water bodies in the four watersheds are listed in the Wyoming Department of Environmental Quality 1998 303d List of Water Bodies Requiring TMDLs, there needs to be discussion concerning whether proposed timber harvest and road construction could result in increased sedimentation in TMDL sections of the Little Medicine Bow River or the North Platte River.

We understand that following timber harvest and other silvicultural activities temporary roads will be closed. Upon project termination we recommend that elimination of road cuts be

Based on the procedures the EPA uses to evaluate the adequacy of the information and potential impacts of the proposed action and alternatives in an EIS, the EPA rates this DEIS as EC-2. This means that additional information, as noted especially that related to sedimentation and water quality, would allow us to more fully assess preferred alternative environmental impacts. A copy of our rating criteria is attached.

The EPA appreciates the opportunity to review and comment on the DEIS. Should you have any questions, please contact Mike Hammer of my staff at (303) 312-6563.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cynthia G. Cody', with a stylized flourish at the end.

Cynthia G. Cody, Chief
NEPA Unit
Ecosystem Protection Program

cc: Elaine Suriano, OFA EPA-HQ